

Review of The Comptroller's Division of Property Assessments Sketching Determinations



These are only a few examples of numerous suspect observations noted by the auditors from the Comptroller's Division of Property Assessments. While our standard practice is:

- in person examination
- understanding of aerial imagery limitations
- and knowledge of construction practices

The state appears to be over relying on a commercial 3rd party tools (Zillow and Redfin). There are no state statutes, manuals, DPA memos or directives which recognize 3rd party public sources as authoritative for assessment purposes, nor should they. We rely on an understanding of construction types and physically observable characteristics. The DPA appears to rely on Redfin and Zillow.

Term Abbreviations used:

- Base= base /primary level, main floor of a building
- FGA= finished garage (dry walled)
- USF= upper story, finished (heated and cooled usable living space)
- OPF= open porch, finished

- OPU= open porch, unfinished

Parcel ID 068F-B-033.00-000

Exterior Information

Type: 0100 - Single Family
Story Height: 1.5 - 1.5 Stories
(Liv) Units: 1
Found: 01 - 12 Block
Frame: 21 - Frame Vinyl
P. Wall: 21 - Frame Vinyl
Sec Wall: 0
Roof Str: 05 - Hip/Gable
Roof Cnt: 05 - Composition Shingle
Color: 0
View: 0
Shape: 0
Bld Name: 0

General Information

Grade: 01 - Average
Year Bt: 1999
ET Yr: 2010
AT LUC: 0
Juns: 0
Can Mod: 0

Interior Information

Avg Ht / Ft: 8.00
P. Int Wall: 07 - Drywall
Sec Int Wall: 0
Partition: 0
P. Floor: 01 - Allowance
Sec Floor: 0
Bmt Floors: 0
Sub Floors: 0
Bmt Garage: 0
Electric: 0
Insulation: 0
Int Vs Ext: 0
Heat Fuel: 0
Heat: 0 - Heat Pump
Heat Sys: 0
Heated: 0
Sol HW: 0
Com Wall: 0
Sprink: 0

Condo Information

Location: 0
Tot Units: 0
Floor: 0
% Own: 0
Name: 0

Comments

Re-Reviewed by Colin Barnes CB ADDED A PATIO AND REMOVED SQFT FROM THE DRWY. FOUND ON DPA REVIEW. SUBMITTED CHANGE NOTICE. Updated utility building

Sketch

Per Redfin, JSF covers the entire BASE & FGA

Bath Features

Full Bath: 0 Rng
Add Full: 0 Rng
3/4 Bath: 0 Rng
Add 3/4: 0 Rng
1/2 Bath: 0 Rng
Add 1/2: 0 Rng
Other Fla: 10 Rng

Res Breakdown

Floor: 1
No. Unit: 0
Rooms: 0
Bdrms: 0
Bld Total: 1
Pct Total: 1

Remodeling

Exterior: 0
Interior: 0
Add: 0
Kitchen: 0
Bath: 0
Plumb: 0
Electric: 0
Heating: 0
General: 0

Other Features

Kitchens: 0 Rng
Add Kit: 0 Rng
Fireplaces: 0 Rng
WS Flues: 0 Rng

Calc Ladder

Base Rate: 100.00
Size Adj: 1.05731
Con Adj: 1.12583
Adj Pct: \$119.04
Grade Flt: 1.00000
Other Feat: \$12.000
NBH Mod: 1.0400
NBH Int: 1.0000
LUC Flt: 1.0000
Adj Tot: 286.912
Base Rate: 100.00
Dep'r Total: 34.429
Juns Flt: 1.0000
Spec. Features: \$0
Lump Sum: 0
Final Total: \$252.500
Override Val: 0.2500
Assesmt Val: \$63.125
Total \$/SF: \$31.16
Undepr \$/SF: 119.04000

Depreciation

Phys Con: AV - Average
Functional: 12
Economic: 0
Special: 0
Override: 0
Total: 12%
Depr %: 12%
Undepr \$/SF: 119.04000

Mobile Home

Make: 0
Model: 0
Serial: 0
Year: 0
Color: 0

Comparable Sales

Rng: 0
Parcel ID: 0
Type: 0
Sale Date: 0
Price: 0
Avg Rng: 0
Ind Val: 0

Sub Areas

Code: Desc: Net Area: Gross A: F. Area: Sz Adj A: Rate Adj: Undepr Val: S. Area: Alt Type: % Alt: Tenants: Qual: % U:
BASE: Base: 1,248: 1,248: 1,248: 1,248: 119.04: 148,562:
USF: Upper Story: 778: 778: 778: 778: 107.13: 83,347:
FGA: Finished Garage Attch: 308: 308: 0: 0: 65.47: 20,165:
OPF: Open Porch Finished: 100: 100: 0: 0: 53.57: 5,357:
Building Totals: 2,434: 2,434: 2,026: 2,026: 257,431:
Parcel Totals: 2,434: 2,434: 2,026: 2,026: 257,431:

Alt Areas

S. Area: Alt Type: % Alt: Tenants: Qual: % U:
0: 0: 0: 0: 0: 0:

Special Features / Yard Items

Code: Desc: A: Y/S: Qty: Size: Qual: Con: Year: Unit Pct: D/S: Depr %: LUC: Flt: NBC: Flt: Juns: Flt: Appr Val: Assesmt:
RD DECK: Wood Deck: D: S: 1: 100.00: A: AV: 1999: 25.59: 8: 12%: 6000: 1: AGRI: 1: 1: 1: 2,300: 575:
DRWY: Driveway: A: Y: 1: 1280.00: P: AV: 2005: 4.25: 1: 45.22%: 6000: 1: AGRI: 1: 1: 1: 1,700: 425:
RD DECK: Wood Deck: D: S: 1: 160.00: A: AV: 2005: 25.59: 8: 12%: 6000: 1: AGRI: 1: 1: 1: 3,600: 900:
UTL BLD: Utility Building: A: Y: 1: 280.00: P: AV: 2009: 30.50: 1: 13%: 6000: 1: AGRI: 1: 1: 1: 4,800: 1,200:
PAT: Patio: D: Y: 1: 500.00: A: AV: 2005: 11.47: 1: 37.91%: 6000: 1: AGRI: 1: 1: 1: 3,000: 750:
Building Totals: Yard Item Appr: 9,500: Special Feature Appr: 5,900: 15,400: 3,850:
Parcel Totals: Yard Item Appr: 9,500: Special Feature Appr: 5,900: 15,400: 3,850:

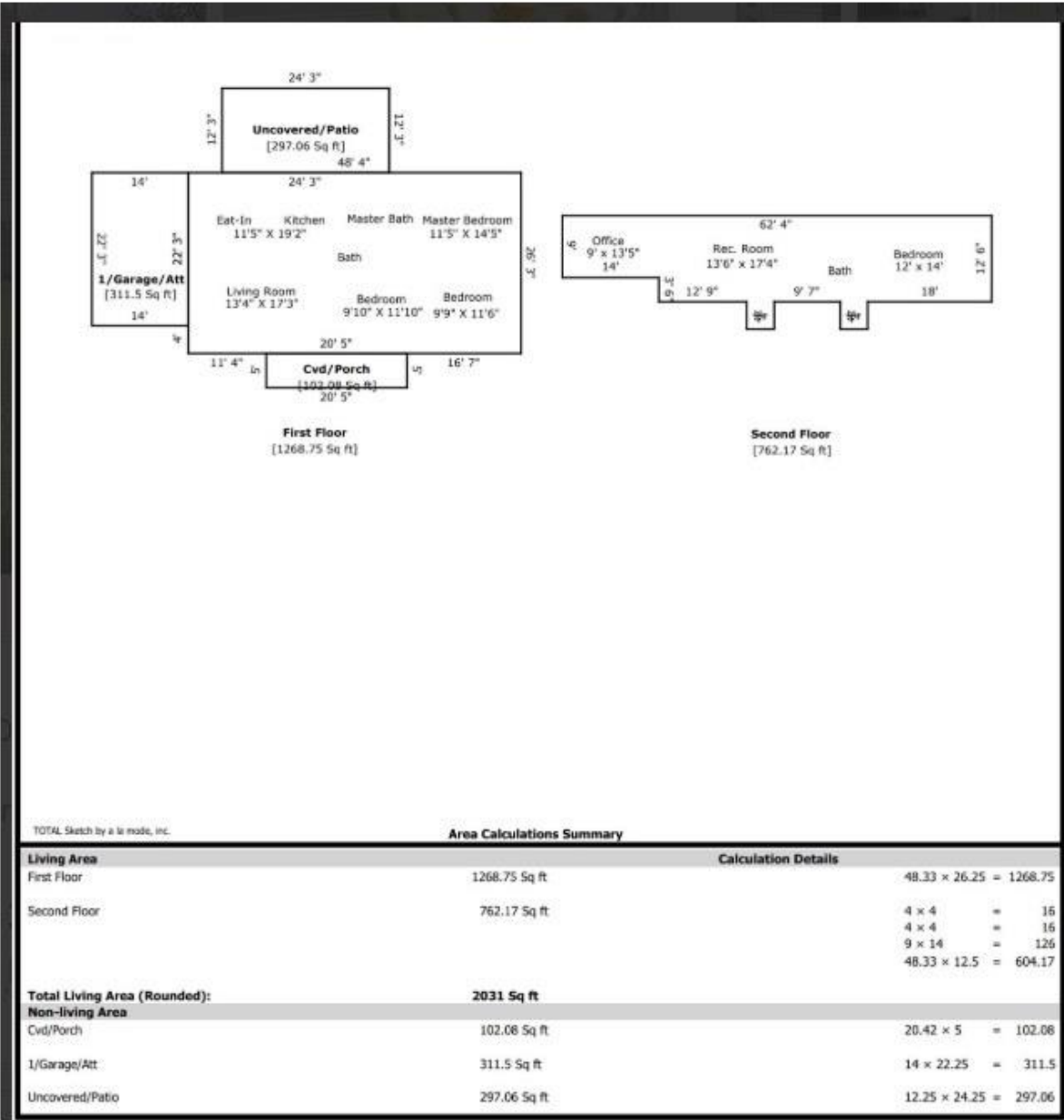
Image

Disclaimer: This information is believed to be correct but is subject to change and is not guaranteed

Property: 37182 | Bld: 37532 | Seq: 1 | Year: 2025 | Data As Of Date: 07/30/2025 | User: wbrock | DB: Assess00Rutherford

Redfin's description does not have the entire 2nd floor covered.(Even though the DPA auditor incorrectly claims that it does). This is one example of many the state determined to be in need correction which they got wrong. Our measurements indicate 2,026 square feet while Redfin indicates 2,031 square feet. ***The state is directing us to improperly inflate the square footage to 2794 square feet. That is an increase of 768 square feet on a basic Cape Cod styled home. An increase of \$386/year in inflated property taxes.***

(image pulled from Redfin listing)



They appear to have overestimated the size of the inground pool on the next home. Their measurements take the pool from 968 square feet to 1075 square feet.

[illegible]

On this same property they want us to change an "OPU" (open porch, unfinished) to an "OPF" (opened porch, finished). An OPU indicates a porch which lacks finished ceilings. By calling the unfinished open porch a finished porch **the value inflates by \$12,655.**





This is not a finished porch.

The state is directing us to count the *"entire space above the garage as livable space"*.

Field Checked by our staff 10/3/2025



Keying at the state's direction would inflate the square footage by 336 square feet resulting in an inflated market value of \$35,552 and county property tax increases of \$169/year.

Comptroller admits what they did in Rutherford County is a "Statewide Standard"

There is substantial indication that many of the determinations, by the state, that we are non-compliant with correcting errors *are because there may have been no material errors present to correct.*

On May 16th, 2022 we actively sought guidance on proper measuring standards and were informed the "state has no standards".

From: Ryan Duggin <Ryan.Duggin@cot.tn.gov>
Sent: Monday, May 16, 2022 1:48 PM
To: Rob Mitchell; Bryan Kinsey
Cc: Russell Key
Subject: Re: Measurement Standards for Assessor's

**EXTERNAL EMAIL
WARNING**

Please do not open links, nor attachments, without verifying their authenticity.

Rob,

I assume you are referring to topics like rounding to the nearest foot versus inches when measuring. To my knowledge, we do not have a standard on measurement of buildings. From what I've heard, rounding to the nearest foot was the result of a CAMA field limitation from years ago. I believe most assessors have continued to round to the nearest foot even if their CAMA will now allow decimals. It would be an internal policy you would set for your office.

Ryan Duggin, AAS, TMA
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Division of Property Assessments
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What should concern citizens the most is this: "the agency charged with oversight and uniform application of best practices admits they have no adopted standards for accurately measuring property for tax purposes."

This oversight agency, which maintains and monitors the sketches and valuations in all but 9 counties in Tennessee, "*may be improperly inflating square footages, potentially overtaxing and harming millions of hard working Tennesseans.*"